

BEFORE THE  
**FEDERAL COMMUNICATIONS COMMISSION**  
WASHINGTON, DC 20554

In the Matter of	)	
	)	
Connect America Fund	)	WC Docket No. 10-90
	)	

**COMMENTS OF INTERBEL TELEPHONE COOPERATIVE, INC.,**

**REGARDING AREAS SHOWN AS UNSERVED ON THE NATIONAL BROADBAND MAP FOR CONNECT  
AMERICA PHASE 1 INCREMENTAL SUPPORT**

**Submitted January 22, 2013**

InterBel Telephone Cooperative, Inc., ("InterBel"), hereby submits comments to the Wireline Competition Bureau noting several concerns with inaccurate data provided in the National Broadband Map included in the Commission's Public Notice dated December 12, 2012, published at <http://www.fcc.gov/maps/unserved-fixed-broadband>. We are also providing an analysis of the National Broadband Map updates and corrections within our coverage in Northwest Montana.

InterBel respectfully contests the following concerns with inaccurate and understated broadband coverage (taken from data dated December 2011) provided within the Unserved Broadband Map for our area and also question the viability of Census Block methodology used to determining the need and distribution of Universal Service dollars for determining eligibility for Connect America Fund Phase 1 incremental support. In our reviewing of the National Broadband Map InterBel has determined multiple errors in our CLEC study area of Eureka town, Rexford Town, and surrounding areas not only encompassing Eureka and Rexford, but also a part of our ILEC study area around Trego, Montana.

InterBel's review of the Unserved Fixed Broadband Map has determined the following concerns:

- 1) Understated broadband coverage (i.e., census blocks that are listed as unavailable/unserved when they are in fact served by InterBel as a Competitive Local Exchange Carrier or CLEC) within Price Cap area.
- 2) Reported Price Cap area that overlap into InterBel's Incumbent Local Exchange Company (ILEC) study area.

- 3) Reported Price Cap area that is not served by a Price Cap within our ILEC study area.

InterBel is a CLEC and also an ILEC providing fixed voice and broadband services to over 1200 square miles. InterBel provides voice and broadband as a Competitive Local Exchange Company (CLEC) within the reported Price Cap area that meets the criteria as required by the Commission in the towns of Eureka and Rexford. In both of these areas, InterBel provides ADSL downspeed streams from 6 Mbps to 16 Mbps with upspeed streams of 1 Mbps and fiber to the home downspeeds from 6 Mbps to 25 Mbps with upspeeds streams of 1 Mbps to 10 Mbps.

As an ILEC, InterBel serves the town of Trego and its outlying areas with voice and broadband, in analyzing this area we discovered the National Broadband map incorrectly reports it a Price Cap area. It is also incorrectly stated as broadband "unavailable", when InterBel serves this area with broadband speeds that are within the required FCC criteria.

InterBel has consulted Geodata Services, Inc., to assist in the analysis of the National Broadband Map; Geodata has identified our study area where InterBel's Broadband is not accurately reflected in the Commission map. InterBel has attached two maps documenting our contested census blocks provided by Geodata Services Inc. We are also prepared, if necessary, to provide a geocoded list of such contested census blocks. Geodata Services Inc., is the entity contracted by the State of Montana to conduct mapping funded through the State Broadband Data and Development (SBDD) program administered by National Telecommunications and Information Administration (NTIA). Our company has participated in each update cycle made available to us, whereby access can be found at: [http://www.broadband.mt.gov/broadband\\_map.aspx](http://www.broadband.mt.gov/broadband_map.aspx).

We appreciate the Commission's time and attention to these matters expressed in our comments.

Attachments: Map # 1 – Eureka Area  
Map #2 – Trego Area

Respectfully,



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Randy Wilson, General Manager  
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